

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	Chapter 7
)	
)	
PRECISE GRAPHIX, LLC,)	Case No. 21-12663 PMM
Debtor.)	
)	
)	

**SUPPLEMENTAL DECLARATION OF LAWRENCE J. KOTLER
IN FURTHER SUPPORT OF APPLICATION
FOR AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF DUANE MORRIS LLP AS COUNSEL TO THE CHAPTER 7 TRUSTEE
PURSUANT TO 11 U.S.C. § 327(a) NUNC PRO TUNC TO SEPTEMBER 30, 2021**

I, Lawrence J. Kotler, Esq., an adult individual, hereby declare under penalty of perjury:

1. This Supplemental Declaration supports and supplements my prior Declaration submitted to the Court on October 7, 2021 at Docket No. 14, Exhibit B.
2. On July 5, 2023, Camping World, Inc. (“Camping World”) filed an *Application for Entry of an Order Allowing and Compelling Payment of Administrative Expense Pursuant to Section 503(b) of the Bankruptcy Code* (the “503(b) Motion”).
3. Following the filing of the 503(b) Motion, I learned that Camping World and NBC are clients of my firm and Duane Morris has (and continues to) represent them in matters wholly unrelated to the Debtor’s bankruptcy case or its estate (the “Other Matters”).
4. In light of the *di minimis* nature of the claim sought in the 503(b) Motion (e.g., \$3500.00), I requested my in house counsel to see if Duane Morris should obtain a waiver from

Camping World (as they filed the Motion) and Ms. Feldman, if only for the limited purpose of resolving the 503(b) Motion¹.

5. My firm's in house counsel was successful in her efforts to obtain a limited waiver from both Camping World and Ms. Feldman to permit me to negotiate a resolution of the 503(b) Motion with Camping World's attorneys, all of whom work at Latham and Watkins LLP.²

6. The Trustee and Camping World have resolved the 503(b) Motion and a Stipulation³ memorializing that resolution will be filed with the Court shortly.

7. It is my understanding that the revenue obtained by Duane Morris' representation of Camping World and NBC in the Other Matters account for less than 1% of my firm's annual revenue.

8. Duane Morris will not represent Camping World nor NBC in this bankruptcy case and, to the extent, an issue arises involving or have any relationship with any such entity, which would be adverse to the Debtor or its estate, the Trustee will engage conflict counsel to handle such matters.

9. This Declaration is made pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of July, 2023 in Philadelphia, Pennsylvania.



Lawrence J. Kotler, Esq.
Partner
Duane Morris LLP

¹ It should be noted that following the filing of the 503(b) Motion, I, along with Ms. Feldman, reached out to Camping World's local counsel to inform counsel that Camping World would be reimbursed the \$3500.00 appeal fee.

² The waiver language has been forwarded to the United States Trustee's Office.

³ Camping World's counsel negotiated the terms and conditions of the Stipulation on behalf of the non-estate parties.